

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
ABERDEEN DIVISION

**KENDRICK SLAUGHTER, NADJA WALKER,  
ANTJUAN JETHROW, ALMA WREN, MATTIE COLLINS,  
JINISHA SIMONDS, DAISY LANDRUM, CORTEZ LANDRUM,  
NANNETTE TANKSLEY, AND DEION SANDERS on Behalf of Themselves  
and Others Similarly Situated** **PLAINTIFFS**

**v.** **CAUSE NO.: 1:17-cv-00210-GHD-DAS**

**NORTH ATLANTIC SECURITY COMPANY,  
AND JOHN DOES 1 -20, Individually** **DEFENDANTS**

**JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT  
AND DISMISS ACTION WITH PREJUDICE**

The Plaintiffs and Defendant jointly request that the Court approve the parties' settlement agreement and dismiss the action with prejudice as follows:

1. The Plaintiffs allege that they were not paid overtime by the defendant - their former employer—as required by the Fair Labor Standards Act. The Defendant denies the Plaintiffs' allegations and responds that it complied with the FLSA in compensating them. Thus, there is a genuine dispute between the parties based on these conflicting positions about whether compensation is owed to the Plaintiffs under the FLSA.

2. Specifically, the Plaintiffs worked as security guards for Defendant for various years or months. They claim they were not paid overtime for hours they worked over 40 hours each week. Faced with this dispute, the parties have compromised their positions and reached an agreement to settle the dispute between them without continuing to litigate.

3. The parties reached a settlement by agreeing to an amount for each Plaintiff based on a review of records, including time sheets. The Defendant has agreed to pay the Plaintiffs that amount to settle the action as follows:

- (a) Plaintiff Kendrick Slaughter shall be paid the sum of Twenty Thousand Dollars (\$20,000.00), upon his signing of an absolute release and settlement of his claim against Defendant;
- (b) Nine (9) Plaintiffs, Nadja Walker, Antjuan Jethrow, Alma Wren, Mattie Collins, Jinisha Simonds, Daisy Landrum, Cortez Landrum, Nannette Tanksley and Deion Sanders, will receive Fifteen Hundred Dollars (\$1,500.00) each upon signing an absolute release.
- (c) The parties further agree that Defendant shall pay Plaintiffs' attorney fees in the sum of Fifteen Thousand Dollars (\$15,000.00), and expenses of Four Hundred Sixty-Five Dollars (\$465.00);
- (d) Defendant shall pay Plaintiffs' expert witness fees in the sum of \$6,024.70.
- (e) The total sum of \$54,989.70 shall be paid by Defendant to Plaintiffs' counsel no later than October 11, 2019.

4. Further, the Agreement herein was entered into by the parties only after investigation of the claims, litigation of their merits, and negotiation by counsel.

5. The parties therefore respectfully request that the Court approve the parties' settlement agreement and dismiss this action with prejudice and enter the proposed order being submitted to the Court.

Dated: September 26, 2019.

Respectfully submitted,

**NORTH ATLANTIC SECURITY COMPANY**

*By Its Attorney,*

BY: /s/ Courtney B. Smith

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**KENDRICK SLAUGHTER, NADJA WALKER,  
ANTJUAN JETHROW, ALMA WREN, MATTIE  
COLLINS, JINISHA SIMONDS, DAISY  
LANDRUM, CORTEZ LANDRUM,  
NANNETTE TANKSLEY, AND DEION  
SANDERS**

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